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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of	)	
	)	IB Docket No. 96-261
International Settlement Rates	)	

To: The Commission

COMMENTS OF THE REGIONAL TECHNICAL COMMISSION ON TELECOMMUNICATIONS OF CENTRAL AMERICA

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February 7, 1997

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SUMMARY

The member countries of the Regional Technical Commission on Telecommunications of Central America ("COMTELCA") are committed to moving accounting rates toward cost and promotng competition. However, COMTELCA is opposed to the FCC's attempt to unilaterally impose its international settlements policy on the rest of the world.

The countries of Central America have low per-capita incomes, significant rural populations, and telephone penetration rates between three and 15 percent. Most of COMTELCA's member countries also have suffered through social and political upheavals. Nevertheless, the national governments that comprise COMTELCA have made significant efforts in recent years to upgrade their telecommunications infrastructures. For example, El Salvador's national telephone company (ANTEL) is in the midst of a five-year, $346 million modernization program designed to increase El Salvador's telephone penetration rate from 6.6 to 9.5 percent by the year 2000. Similarly, Guatemala's national telephone company (GUATEL) has adopted a plan to increase Guatemala's telephone penetration from three to 10 percent by 2000, while extending service to 100 new rural villages each year.

COMTELCA's member countries also have made great strides in promoting liberalization and privatization of their telecommunications sectors. For example, Nicaragua's ENITEL will be privatized by March 1997, El Salvador's ANTEL by April 1997, and Panama's INTEL by the end of the first half of 1997. Honduras and Guatemala also are currently taking steps to privatize their national telecommunications companies. Virtually all of the member countries have aggressively rebalanced their domestic and international tariffs, reduced

accounting rates with U.S. carriers, created independent regulatory commissions, and opened their telecommunications sectors to competition.

Rapid, drastic reductions in accounting rates would significantly reduce the settlements payments to carriers in the COMTELCA countries without an offsetting increase in collections. The end-result would be to reduce the total revenues of COMTELCA carriers, thereby impairing their continued ability to develop their infrastructures. COMTELCA is especially concerned by the FCC's proposal to establish three benchmark accounting ranges based solely on the per capita income of a given country. The approach would put only two Central American countries (Honduras and Nicaragua) in the low income category, while placing the other Central American countries in the middle income category. Given their low level of development in the telecommunications sector, COMTELCA believes that any benchmark accounting rate established by the FCC should put <u>all</u> of the countries in the Central American region at the level for the least developed countries.

COMTELCA believes that the most appropriate way to reform the settlements process is to seek a negotiated, multilateral consensus on accounting rate reform through the auspices of the relevant international organizations, such as the Organization of American States' Inter-American Telecommunications Commission ("CITEL") and the ITU. After consensus has been reached within the Americas, a unified proposal should be introduced at Study Group 3 of the ITU for world-wide consideration. Any agreement reached should be based on ITU Recommendation D.140, and should allow an adequate period of time -- between seven and ten years -- for less developed countries to make the transition to more cost-oriented accounting rates.

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INTRODUCTION

The Regional Technical Commission on Telecommunications of Central America ("COMTELCA") hereby submits these comments regarding the proposals made by the United States Federal Communications Commission ("FCC") to reform the international settlements process.[1] The members of COMTELCA are committed to moving accounting rates toward cost and promoting competition. However, COMTELCA is opposed to the FCC's attempt to unilaterally impose a new international settlements policy on the rest of the world. Rather, COMTELCA believes that the most appropriate way to reform the settlements process is to seek a negotiated, multilateral consensus on accounting rate reform through the auspices of the relevant international organizations. Any agreement reached should be based on ITU

1 International Settlement Rates, Notice of Proposed Rulemaking, IB Docket No. 96-261, FCC 96-484 (rel. Dec. 19, 1996) ("Notice").

Recommendation D.140, and should allow an adequate period of time -- between seven and ten years -- for less developed countries to make the transition to more cost-oriented accounting rates.

STATEMENT OF INTEREST

COMTELCA was established in 1966. Its primary mission is to coordinate and promote the development and expansion of the regional telecommunications network of Central America. COMTELCA's members include the Costa Rican Institute of Electricity ("ICE"), the Guatemalan Telecommunications Company ("GUATEL"), the Honduran Telecommunications Company ("HONDUTEL"), the National Telecommunications Administration of El Salvador ("ANTEL"), the Nicaraguan Telecommunications Company ("ENITEL"), and the National Telecommunications Institute of Panama ("INTEL").

I. THE MEMBERS OF COMTELCA HAVE MADE SIGNIFICANT PROGRESS IN DEVELOPING THE INFRASTRUCTURE AND LAYING THE GROUNDWORK FOR COMPETITION, WHILE REDUCING ACCOUNTING RATES

A. The COMTELCA Countries Are Working to Develop Their Telecommunications Infrastructures and Create a Competitive Market

The national governments that comprise COMTELCA have made major efforts in recent years to liberalize and privatize the telecommunications sectors of their economies. The progress in each country is described below.

Costa Rica. Despite limited funding, the Costa Rican Institute of Electricity ("ICE") has made significant efforts to develop its telecommunications network. As a result, the telephone penetration rate has grown from 10.5 percent in 1992 to about 15 percent. According to one observer, ICE has:

> improved the response time for client services throughout the country, has improved timeliness of outage repairs and installation of new service, and has increased call completion rates for operator services and call completion rates for both national and international service.[2]

ICE has taken significant actions to prepare the way for competition. For example, in 1995 it completed a corporate restructuring that separated its telecommunications and electricity businesses into distinct divisions, thus eliminating the capacity to use telecommunications revenues to cross-subsidize electrical services. ICE also has significantly reduced its international calling rates.

In March 1996, the Costa Rican Government recommended enactment of a new law that would establish an independent regulatory commission, promote network modernization, and rebalance local and international telecommunications tariffs. At present, legislation is being considered in the Costa Rican Congress which would permit both ICE and private companies to compete for state-granted licenses on an equal, nondiscriminatory basis, and eliminate all restrictions on foreign investment in telecommunications services.

El Salvador. El Salvador is working to modernize its telecommunications infrastructure, which was severely harmed by a long-running civil war that ended in 1992. This

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[2] H. Morrison, "Costa Rica: The Commercial and Regulatory Environment," DATAPRO Reports on International Telecommunications, 4050.

task is complicated by the fact that over 50 percent of the country's population lives in difficult-to-serve rural areas. Despite these obstacles, the National Telecommunications Administration of El Salvador ("ANTEL") has made progress in infrastructure development. ANTEL is in the midst of a five-year, $346 million modernization program. The telephone penetration rate is now about 6.6 percent, up from 2.9 percent in 1988. ANTEL plans to increase nationwide telephone density to 9.5 percent by 2000.

On September 12, 1996, El Salvador's Legislative Assembly passed a law creating one of the most liberalized telecommunications regimes in Latin America. The law encourages competition in all areas of the telecommunications sector. Licenses already have been granted to competing private companies in the areas of wireless services, international data service, and private networks. The new telecommunications law transferred regulatory authority from ANTEL to the Superintendency General for Electricity and Telecommunications ("SIGET"), a newly established and independent regulatory commission. The Government intends to rely principally on market competition, with SIGET limited to settling interconnection disputes and allocating radio spectrum.

In November 1996, El Salvador's Legislative Assembly passed a law authorizing the privatization of ANTEL. ANTEL will be divided into two companies with "checkerboard" service areas to promote competition. By April 1997, fifty-one percent of both companies will be sold to a strategic foreign investor with telephone management experience. An additional ten percent interest will be sold to ANTEL employees, and the remaining stock will be sold to the public over the next few years.

Guatemala. Although the Guatemalan Telecommunications Company ("GUATEL") has made great strides in improving and expanding its service, Guatemala's current telephone penetration rate is about three percent nationwide -- with a one percent penetration rate in rural areas. The Guatemalan Government has adopted a plan to achieve a telephone penetration rate of 10 percent by 2000. Because 70 percent of the Guatemalan people live in the countryside, the Government has made rural network modernization a top priority. Over the next few years, the Guatemalan Government plans to install, in conjunction with AT&T and MCI, tens of thousands of access lines in rural areas, which will allow it to extend service to 100 new rural villages each year.

In October 1996, the Guatemalan Congress adopted legislation that opens the entire telecommunications sector to competition. The law creates a Superintendency of Communications, whose main responsibilities will be promoting universal service to rural areas and implementing regulations pursuant to which all incumbent operators will be required to interconnect with competitors. The law does not set any foreign ownership limits, thereby making it possible for foreign companies to wholly own local service providers, including GUATEL. The Guatemalan Government is currently in the process of privatizing GUATEL.

Honduras. Today, Honduras' telephone penetration rate is only three percent. However, the Honduran Government has committed to achieve significant modernization goals for the telecommunications sector by 2004. This program will include increasing the telephone penetration rate to 12 percent, while ensuring that all villages with more than 500 inhabitants have access to telephone service.

In October 1995, Honduras enacted a new telecommunications law. The law created a new independent government agency, CONATEL, which is responsible for regulating and supervising the management and operation of the telecommunications sector. Under the law, the Honduran Telephone Company ("HONDUTEL") has been given a 25-year concession to provide national and international telephone services. Although this concession is exclusive for the first ten years, the Honduran Government plans to award many competing private concessions for non-basic advanced data services in the near future. After the ten-year exclusivity period is over, private operators will be free to enter any sector of the telecommunications marketplace.

The Honduran Government recently hired advisors to assist it in its proposed sale of a 47 percent interest in HONDUTEL to a strategic, and possibly foreign, investor. The Honduran Government is considering selling an additional two percent of HONDUTEL to its employees during the first two years of the privatization and eventually selling an additional 41 percent to the public.

Nicaragua. The modernization of Nicaragua's telecommunications infrastructure, which was severely harmed by a long-running civil war that ended in 1990, is a top priority of the Government. The telephone penetration rate is currently about 2.2 percent. The telecommunications regulatory body, the Nicaraguan Telecommunications and Postal Institute ("TELCOR"), has set goals of a 4.6 percent penetration rate in 1997 and an 8.5 percent penetration rate in 2005. In recent years, TELCOR has subcontracted infrastructure work to AT&T and Siemens to increase the number of direct-dial international circuits between Nicaragua and the U.S. In a joint venture with Protel, a U.S. company, TELCOR plans to completely digitize its network, install fiber optic links, and offer enhanced services such as electronic fund transfers and packet-switched data.

Nicaragua has aggressively opened up its telecommunications markets to competition. In preparation for competition, the Nicaraguan Government has rebalanced domestic and international tariffs. As a result, the peak rate for calls to the United States fell from $2.10 per minute in February 1994 to $1.15 per minute in September 1996, while local rates increased by as much as 400 percent.

In November 1995, the Nicaraguan National Assembly passed a telecommunications liberalization law that separates TELCOR's telephone operations from its regulatory activities. The newly formed national telecommunications provider, the Nicaraguan Telecommunications Company ("ENITEL"), will be privatized. Under the liberalization law, ENITEL will possess exclusive rights to operate basic local, long distance, and international telephone services, telex service, and telegraph service for four years. After this time, these services will be opened to competition. The tender for ENITEL requires that the strategic investor commit to improve service quality, increase telephone penetration to 12 percent, and increase the number of payphones. The Nicaraguan Government expects to complete the sale of ENITEL in March 1997.

Panama. The Panamanian Government, in conjunction with the National Telecommunications Institute of Panama ("INTEL"), is committed to both modernization and liberalization of the telecommunications infrastructure. INTEL is in the midst of a six-year, $605 million modernization plan pursuant to which it plans to invest over $100 million annually in order to increase the telephone penetration rate to 11.5 percent and make the network 65 percent digital by 2000. INTEL has aggressively lowered its international calling rates in order to improve its competitiveness.

Panama is also taking significant steps to liberalize its telecommunications sector. In February 1995, the Panamanian Legislative Assembly set the stage for the privatization of INTEL by enacting a law allowing INTEL to convert from a government agency to a business corporation. The law also permits INTEL to sell 49 percent of its stock to private sector entities. In February 1996, the Legislative Assembly enacted another law establishing an independent regulatory agency for telecommunications. Final bids are to be submitted in March 1997.

B. The Members of COMTELCA Are Working to Lower Accounting Rates

On May 29, 1995, COMTELCA's Directorate General convened an Ad Hoc Group to coordinate the accounting rate negotiations between member countries and the U.S. carriers. At this meeting, COMTELCA's board of directors adopted principles to govern future accounting rate negotiations. These principles included commitments to rebalance local and international tariffs in accordance with Recommendation D.140, while working to reduce the traffic imbalances that exist with industrialized countries.[3]

Based on these principles, COMTELCA is working to move its member countries' accounting rates closer to cost. Guatemala's accounting rate with the U.S. carriers has decreased from $1.50 in 1992 to $1.00 today, with a further reduction to 90 cents by October 1997. El Salvador's accounting rate has decreased from $1.20 in 1995 to the current level of

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3 See COMTELCA, Recommendations of Ad Hoc Group on Accounting Rates (Tegucigalpa, May 29, 1995).

$1.00. Costa Rica has decreased its accounting rate from $1.35 in 1991 to $1.15 today. Honduras' accounting rate has decreased from $1.50 in 1996 to $1.25 today, with a further reduction to $1.15 by July 1997. The accounting rate for calls between Nicaragua and the United States has decreased from $1.50 in 1994 to $1.15 today.

II. ADOPTION OF THE FCC'S PROPOSALS WOULD ADVERSELY AFFECT CENTRAL AMERICA'S ABILITY TO CONTINUE TO PROMOTE LIBERALIZATION AND INFRASTRUCTURE DEVELOPMENT

A. The FCC's Own Policies Are the Primary Cause of the International Traffic Imbalance

The FCC has expressed considerable concern regarding the current settlements deficit, especially with less developed countries. Yet, the FCC fails to acknowledge that the deficit is primarily caused by industrialized countries, not countries such as those that make up COMTELCA. As the traffic volumes in Appendix A of the Notice demonstrate, the settlements deficit with the highest income countries averages $78 million per country, while the settlements deficit with the least developed countries averages only $45 million. If the FCC genuinely wants to solve the traffic imbalance, it should focus its attention on the large, industrialized countries which are the primary cause of the problem.

The FCC also must recognize that current accounting rate levels are not the main cause of the high rates in the United States for international calls. According to the Notice, the average rate for an international call from the United States is 99 cents per minute.[4] The Notice also indicates, however, that only about one-third of the rate -- 36.5 cents -- is the result of

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4 Notice ¶ 9.

settlements payments made by U.S. carriers to their foreign correspondents.[5] This suggests that the best way for the FCC to reduce rates paid by U.S. consumers is to require U.S. carriers -- over whom the FCC has jurisdiction -- to move their prices toward cost.

In addition, as the Notice recognizes, the FCC's policies promoting the growth of call-back service have contributed to the settlements deficit.[6] As a result of the growth of this service, traffic that would have resulted in settlements payments being made to carriers in the United States instead generates settlements payments from carriers in the United States.[7] Third-country calling, which the FCC also has fostered, has had an even more significant effect: use of this call-back configuration results in U.S. carriers making two settlements payments in order to "patch together" a call from one non-U.S. country to another.

The FCC also has permitted U.S. carriers to engage in call reorigination. This practice allows a carrier to route traffic from one non-U.S. country to another non-U.S. country through the United States. As a result of reorigination, a call that would have completely bypassed the United States is converted into a call from the originating country to the United States, and a second call from the United States to the terminating country, thereby generating an accounting rate outpayment. The FCC was asked to rule on the legality of this practice in 1995, but has yet to issue a decision.[8]

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5 See id. at ¶ 26.

6 See id. at ¶¶ 8 n.10, 12-13.

7 See Via USA, Ltd. 9 FCC Rcd 2288 (1994), on recon., 10 FCC Rcd 9540 (1995).

8 See MCI Telecommunications Corp., "Petition for Declaratory Ruling," Sprint Communications Co., L.P. -- Reorigination of International Telecommunications Traffic (filed Jan. 27, 1995). The growth of Country Direct and collect calling also has (continued...)

The single most effective action that the FCC could take to reduce the United States' traffic imbalance would be to reverse its earlier decision and bar U.S.-based resellers from engaging in call-back unless they have entered into an operating agreement in the country in which the service is to be offered. The FCC should follow this with a decision barring the reorigination of third-country international traffic in the United States.

B. The FCC's Proposals Would Severely Damage the Economic Development Efforts of COMTELCA's Member Countries

As described in Part I, the member countries of COMTELCA have undertaken significant efforts to upgrade their respective telecommunications infrastructures. Nonetheless, the telephone penetration rate in most of Central America remains between three and ten percent. Further progress in infrastructure development will require significant additional revenues.

The Notice suggests that reducing accounting rates would "increase revenues for U.S. and foreign carriers" by stimulating demand for international services.[9] The FCC, however, provides no basis for this estimate. COMTELCA believes it is far more likely that rapid, drastic reductions in accounting rates would reduce significantly the settlements payments to carriers in the COMTELCA countries without an offsetting increase in domestic collections. This could have several adverse effects. Many developing countries pledge their accounting rate

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[8](...continued)
increased the size of the settlements deficit. The large number of immigrants in the United States who make calls to their native countries further exacerbates the inbalance.

[9] Notice ¶ 10 (emphasis added).

payments as collateral to obtain loans (often from U.S. financial institutions) to upgrade their telecommunications infrastructures. Developing countries also are seeking to attract capital through foreign investment. With decreased revenues, foreign loans and investment would be more difficult to obtain. The end-result would be to slow the progress of further infrastructure development and liberalization.

C. Accounting Rates Should Be Equal Throughout the Central American Region

COMTELCA is especially concerned by the FCC's proposal to establish three benchmark accounting ranges based solely on the income per capita of a given country.[10] The approach would put only two Central American countries (Honduras and Nicaragua) in the low income category, while placing the other Central American countries in the middle income category.

The FCC's goal, presumably, is to allow countries with the least developed telecommunications infrastructures to receive the highest settlements payments. The FCC also seeks to promote liberalization. Exclusive reliance on per capita income as a means to establish accounting rate benchmarks is not the most effective means to achieve these goals. As demonstrated above, each of the COMTELCA countries has a very underdeveloped telecommunications system. At the same time, each of these countries has made significant progress in lowering accounting rates and is committed to the introduction of competition to the telecommunications sector. In light of these facts, COMTELCA believes that any benchmark

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[10] Id. at ¶¶ 43-47.

accounting rate set by the FCC for a Central American country should be at the level designated for the least developed countries.

Establishing a single regional accounting rate would be consistent with the FCC's decision in Docket No. 90-337. In that proceeding, the FCC adopted accounting rate ranges based on three world regions: (1) Europe, (2) Asia, and (3) the rest of the world, primarily Latin America and Africa.[11] Continuation of that approach is especially important in regard to Latin America. COMTELCA is working to more closely integrate the telecommunications infrastructures of each of its member countries. Significantly different accounting rates could undermine those efforts.[12]

D. The FCC Should Participate in Efforts to Develop a "Multilateral Consensus" on Accounting Rate Reform

COMTELCA fully supports efforts to move accounting rates toward cost. This issue, however, is not exclusively a dispute between the United States and individual countries. Rather, it involves the operation of the international telecommunications system. Therefore, the only appropriate means to adopt comprehensive accounting rate reform is through multilateral consensus. COMTELCA believes that the Organization of American States' Inter-American

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11 See Regulation of International Accounting Rates -- Phase II, Second Report and Order and Second Further Notice of Proposed Rulemaking, 7 FCC Rcd 8040, 8043 (1992). Country lists based on regions were derived from the "General Plan for the Development of the Interregional Telecommunication Network," CCITT-CCIR (1988). See Regulation of International Accounting Rates -- Phase I, 6 FCC Rcd 3552, 3558 nn.41-42 (1991).

12 The FCC has recognized the importance of preserving "communities of interest," even in cases where they may conflict with cost-based interconnection policies. See BellSouth Telecommunications, Inc. -- Revised Zone Density Pricing Plan, 11 FCC Rcd 13806, 13809 (1996).

Telecommunications Commission ("CITEL") would be the appropriate forum for the first stage of such multilateral negotiations.[13] After consensus has been reached within the Americas, a unified proposal should be introduced at Study Group 3 of the ITU for world-wide consideration.

Any consensus should be based on ITU Recommendation D.140, which provides a realistic and flexible means for determining the cost of terminating international calls. In particular, Recommendation D.140 recognizes that a portion of the terminating carrier's administration, management, research, development, and taxation costs should be recovered through settlements payments.[14] This approach is preferable to the "incremental cost" methodology that the FCC seeks to impose on carriers around the world. Although COMTELCA's member countries are in the process of changing their procedures and systems so that the cost of service will become easier to measure, it is presently impossible to accurately measure the unit costs of providing international services.

Recommendation D.140 also states that "the costs incurred in providing telecommunications services, although based on the same components, may have a different impact depending on the country's development status."[15] Implementation of this principle

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[13] CITEL consists of governments and private sector "associate" members from throughout the Western hemisphere. CITEL serves as a forum whereby member states and the private sector work together to implement regulatory reforms necessitated by the move towards telecommunications privatization in many Latin American countries.

[14] See ITU Recommendation D.140 at Annex A.2.2. The FCC's reliance on ITU Recommendation D.300R is entirely inappropriate. The recommendation, by its terms, is only applicable to the telecommunications market in portions of Europe. It has no applicability to other regions, such as Central America, which have entirely different characteristics.

[15] Id. at Preamble (b); see also Final Acts of the Plenipotentiary Conference of the International Telecommunication Union, Recommendation 3 (Kyoto 1994) ("[D]eveloped
(continued...)

requires all parties to recognize that the cost to develop the infrastructure in less developed countries to accommodate international traffic may be higher than in countries with a more developed infrastructure. As a result, it may be appropriate to implement a system of <u>asymmetrical</u> settlements payments. Under this approach, carriers in the United States would be required to pay a <u>higher</u> rate to terminate traffic in Central America, while the correspondents from Central America would be able to terminate the return traffic in the United States at a <u>lower</u> rate.

E. Developing Countries Need a Longer Transition Period to Move Accounting Rates Toward Cost

As even the FCC recognizes, developing countries will need some time to make the transition to lower accounting rates. The two to four year period proposed in the <u>Notice</u>, however, is entirely unrealistic. Indeed, even the five year transition period suggested in the current version of Recommendation D.140 -- which would end in 2000 -- now appears too optimistic given the economic and political problems many less developed countries face.[16] In light of these significant impediments, COMTELCA believes that any multilateral consensus on accounting rates should allow for a transition period of seven to ten years.

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[15](...continued)
countries [should] take into account requests for favorable treatment made by developing countries in service, commercial, or other relations in telecommunications.").

[16] This deadline supersedes the 1997 deadline specified in the earlier version of Recommendation D.140, on which the <u>Notice</u> erroneously relies. <u>See</u> <u>Notice</u> ¶ 58.

CONCLUSION

For the foregoing reasons, the FCC should not adopt the proposals contained in the Notice. Instead of seeking to unilaterally impose its accounting rate policies on the rest of the world, the FCC should participate in multilateral negotiations, under the auspices of CITEL and the ITU. Such negotiations should be based on ITU Recommendation D.140, and should provide a period of seven to ten years for the transition to cost-oriented rates.

Respectfully submitted,

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February 7, 1997

CERTIFICATE OF SERVICE

I, James M. Fink, do hereby certify that on this 7th day of February, 1997, I have caused a copy of the foregoing "Comments of the Regional Technical Commission on Telecommunications of Central America" in IB Docket No. 96-261 to be served by hand to the persons listed below.

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